



September 17, 2002

EPA Region 5 Records Ctr.



264460

Thomas Krueger
Associate Regional Counsel
United States Environmental Protection Agency
Region 5
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

Mr. Krueger:

Per your request during our recent telephone conversation, I am submitting this letter to your attention in order to clarify information relating to Tricon Industries, Incorporated and its role regarding the Ellsworth Industrial Park Site in Downers Grove, Illinois.

The following are items of correction and concern:

- *Tricon is leasing manufacturing space at 5400 Janes Avenue.*

William Helwig is the owner of this facility. Tricon merely leases the facility from Mr. Helwig. Your records incorrectly state that Tricon purchased this facility. Please correct this information.
(Exhibit A)

- *Tricon is concerned that the EPA did not name Principal Manufacturing Corporation as a Potentially Responsible Party in the General Notice Letter sent in August 2002, and instead wrongly attributed Principal Manufacturing Corporation's conduct to Tricon.*

Several months ago, Tricon was informed by EPA agent, Joseph Malek, that a former employee of Principal Manufacturing Company supplied information to the EPA about possible disposal of hazardous substances by Principal Manufacturing Company while a tenant at 5400 Janes Avenue. During the presentation on August 20, 2002, the EPA confirmed that the site was tested and did contain excessively high levels of hazardous substances.

Based upon this information, it would seem clear that Principal Manufacturing Company should be named as a Potentially Responsible Party with respect to the liability at the Ellsworth Industrial Park Site. It is my understanding from our attorney, Carol Douglas, who spoke with you, that Principal Manufacturing Corporation is now going to be named and pursued as a Potentially Responsible Party.

In addition, Tricon has never used the hazardous substances of concern at this location, and has no connection to the past activities of Principal Manufacturing Company. For this reason, it is important that the EPA remove Tricon Industries from all references made to the testing and findings at 5400 Janes Avenue, as they are only attributable to Principal Manufacturing Company and/or the building owner, William Helwig. Most importantly, the EPA should remove Tricon from the list of facilities identified as "Probable Source Facilities" in Section 5.4.1 of the Phase II Site Assessment Report distributed at the August 20 presentation. It is clear that Tricon was improperly categorized as a "Probable Source Facility" based solely on TCE soil detections attributable directly to Principal Manufacturing Corporation and/or William Helwig, and not to Tricon.

- *Tricon has never used TCE (Trichloroethylene – CAS# 79-01-6) at the Janes Avenue facility or, to the best of our knowledge, at any facility.*

Tricon has safely used limited quantities of PCE (Perchloroethylene also known as Tetrachloroethylene – CAS#127-18-4) and TCA (1.1.1 Trichloroethane – CAS# 71-55-6). Your records incorrectly references the use of TCE at Tricon. Please correct this information.
(Exhibit A)

To the limited extent Tricon has used chlorinated solvents in the operation of its business, Tricon has used and disposed of them in a safe, responsible and lawful manner. This fact is demonstrated by the significant documentation provided to the EPA by Tricon, and is further corroborated by the EPA's testing and findings regarding the Ellsworth Industrial Park. Nevertheless, as a member of the Ellsworth Industrial Park community, Tricon shares the concerns raised by the EPA and the residents of Downers Grove in ensuring that drinking water is safe for everybody. For this reason, Tricon has been as cooperative and forthright as possible in responding to the EPA, and will continue to work with the EPA and other present and former members of the Ellsworth Industrial Park to achieve a fair solution to this problem. At this point, however, Tricon believes it is critical that the EPA correct inaccurate information regarding Tricon's activities in the Ellsworth Industrial Park.

Thank you for your attention to this matter. Please contact me if you have any questions.



John J. Winkler
Vice President - Internal Operations

Cc: R. Grandle
L. McDaniel
C. Douglas – Ungaretti & Harris

EXHIBIT A

ELLSWORTH INDUSTRIAL PARK SITE f/k/a DOWNER GROVE GROUNDWATER ASSESSMENT PRP RESPONSE SUMMARY TABLE

PRP Name Contact Information	Correspondence Information	Use/Generation of Chlorinated Solvents	Permits/Spills/Facility Investigations	Period of Operations
<p>Tricon Industries, Inc. 2325 Wisconsin Avenue Downers Grove, IL 60515</p> <p><u>Respondent:</u> Tricon Industries, Inc. Corporate Headquarters Ralph Grandle, President 1600 Eisenhower Lane, #200 Lisle, IL 60532 (630) 964-2330 Fax: (630) 829-5125</p>	<p><u>IEPA letter sent:</u> 10/3/01</p> <p><u>Response date:</u> 10/18/01</p> <p><u>U.S. EPA CERCLA 104(e) sent:</u> 3/29/02</p> <p><u>Response date:</u> 4/19/02</p>	<p><u>IEPA Response:</u> A limited amount of hazardous chemicals are stored at the facility. PCE is used in the degreasing process. Waste PCE is shipped off-site for recycling.</p> <p>Between 1983 and 1990, Tricon Industries, Inc., generated waste TCE and PCE, according to the waste manifests provided with the response.</p> <p>Between 1992 and 1997, Tricon Industries, Inc., purchased an average of about 10 drums of PCE per year from Parko, Inc., or Finishing Equipment, Inc., for use in its degreaser.</p> <p><u>U.S. EPA Response:</u> PCE has always been purchased in 55-gallon drum quantities and stored in two (2) drums of new solvent and two (2) or three (3) drums of used solvent. Used PCE was either recycled or fuel blended off site by the supplier or a waste disposal company. All solvent was maintained indoors in an area with no floor drains.</p> <p>Until 1998, Tricon Industries, Inc., also used 1,1,1-TCA in small quantities as a cold batch degreaser. Two (2) to three (3) drums of new and used solvent were the maximum quantities on hand. Employees of the cleaning department are certified class</p>	<p><u>IEPA Response:</u> Permits: 1) Since at least 1984, Tricon Industries, Inc., has held an IEPA Operating Permit to operate an open top vapor degreaser. The most recent was a lifetime permit issued April 25, 2001. Solvent use is not to exceed 0.5 tons/month or 4.6 tons/year. PCE is the only solvent to be used in the degreasing process. 2) Tricon Industries, Inc., is permitted by the Downers Grove Sanitary District to discharge industrial wastewater into the sanitary sewer system, subject to compliance with pretreatment standards. Spills: There have been no leaks, spills or releases of hazardous materials at the facility. There has been no soil removal from the facility. Facility Investigations: None noted.</p> <p><u>U.S. EPA Response:</u> Permits: Since at least 1985, Tricon Industries, Inc., has been permitted to discharge industrial wastewater into the Downers Grove Sanitary District sewer system. The current permit was issued on October 15, 2000. Spills: None. Facility Investigations: The Downers Grove Sanitary District conducts routine annual site visits. Tricon Industries, Inc., has incurred several non-chlorinated solvent related permit violations, and has addressed them appropriately. The most common violation was late submittal of self-monitoring reports.</p>	1963 - present

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PRP RESPONSE SUMMARY TABLE

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Tricon Industries, Inc., continued:		Waste solvent handlers, continued: 1993-1999: Hydrite Chemical Co. U.S. EPA #WID000808824 42 drums - 2,310 gallons		
<p>Response Summary: <u>IEPA Response:</u> Tricon Industries, Inc., purchased the facility in 1959 and has been operating there since 1963. There were no prior operators at the property. Tricon Industries, Inc., manufactures insert injection molded componentry and performs metal stamping, assembly, plating and finishing operations. Plating/finishing is the only process that consumes hazardous materials, which are used in vapor degreasing, plating, and wastewater treatment. The facility does not have solid waste management units. All hazardous and non-hazardous wastes generated by the finishing department are collected in appropriate containers and removed by Heritage Crystal-Clean for disposal or recycling. Tricon Industries, Inc., performs quarterly wastewater sampling for pH, cyanide, copper, nickel, silver and zinc.</p> <p><u>U.S. EPA Response:</u> Prior to Tricon Industries, Inc.'s, occupation of the facility, the property was vacant land. No storage tanks of any kind have ever existed on the property. All floor drains in the cleaning department empty into the wastewater treatment pit. Floor drains in the vapor degreaser area are plugged to contain a spill of solvent, should one occur. There are no monitoring wells on the property.</p>				

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<p>Tricon Industries, Inc., Continued</p>		<p>"K" wastewater treatment works operators, trained in handling, storage, and use of solvents.</p> <p>According to a source other than this response, Tricon Industries, Inc., released 10,992 lbs. of TCE between 1987 and 1992.</p> <p><u>Solvent Suppliers:</u> 1963-1993: Parco Products No records are available regarding quantities purchased. 1994-present: Finishing Equipment, Inc. 86 drums - 4,730 gallons 2000: Detrix Corp. U.S. EPA #ILD07442938 4 drums - 220 gallons 2000-present: Heritage - Crystal Clean, LLC U.S. EPA #INR000006536 7 drums - 385 gallons</p> <p><u>Waste solvent handlers:</u> 1963-1983: American Chemical Service U.S. EPA #IND016360265 No records regarding quantities are available for prior to 1983. 1983-1990: American Chemical Service 64 drums - 3,520 gallons 1990-1992: Avganic Industries U.S. EPA #WIJ000808824 15 drums - 825 gallons</p>	<p>In October 2001, a Phase I ESA was conducted at the facility, and was followed up with a Phase II ESA in December 2001. Four soil borings were conducted to address areas of concern. Two soil samples revealed PCE above laboratory detection limits, but below soil remediation objective values. Though elevated levels of arsenic were detected in all four soil samples, the arsenic concentration was considered background and not associated with historical operations on the property. No further investigation was recommended.</p>	
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PRP Name Contact Information	Correspondence Information	Use/Generation of Chlorinated Solvents	Permits/Spills/Facility Investigations	Period of Operations
<p>Principal Manufacturing Corporation Paul Barnett, President 2800 S. 19th Ave. Broadview, Illinois 60153 (708) 865-7500 Fax: (708) 865-7632</p> <p>Mr. William Hellwig 9 S 456 Millbrook Drive Downers Grove, Illinois 60516</p>				<p>Owned and operated at a portion of Tricon's facility prior to purchase by Tricon.</p>